

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

JUAN CARLOS CASTILLO RINCON

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CRIMINAL ACTION NO. H-18-200

**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE
TO MODIFY CONDITIONS OF BOND**

Defendant Juan Carlos Castillo Rincon (“Mr. Castillo”) seeks leave from this Court to modify the terms of his Conditions of Bond to allow him to seek and maintain gainful employment within the Southern District of Texas.

Pursuant to the Court’s Pretrial Conditions of Bond, Mr. Castillo is presently subject to home confinement and he is being electronically monitored to ensure compliance. The terms of Mr. Castillo’s pretrial bond allow him to leave the home only for medical or religious reasons, and to visit with his attorneys or appear for court ordered obligations.

Mr. Castillo seeks to modify his bond conditions to allow him to seek and maintain gainful employment outside the home. To accomplish this, Mr. Castillo respectfully requests that the Court impose the standard home detention conditions for the Southern District of Texas, namely that he be restricted to his residence at all times except for “employment; education; religious services; medical, substance abuse or mental health treatment; attorney visits; court appearances;

court-ordered obligations; or other activities pre-approved by the Pretrial Services Office or supervising officer.”¹

The Government is UNOPPOSED to this modification.

Respectfully submitted,

RUSTY HARDIN & ASSOCIATES, LLP

/s/ Derek Hollingsworth

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JUAN CARLOS CASTILLO RINCON**

¹ On July 16, 2018, the Court ordered a temporary modification to Mr. Castillo’s conditions of bond to permit him to search for a new residence (Dkt 20). The relief sought in this Motion is not meant to alter that temporary modification because Mr. Castillo is still searching for a new residence.

CERTIFICATE OF CONFERENCE

I hereby certify that I have communicated with U.S. Attorney's Office by email regarding the matters addressed in this Motion, and the Government is unopposed to the relief sought herein.

/s/ Derek Hollingsworth
Derek Hollingsworth

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties.

/s/ Derek Hollingsworth
Derek Hollingsworth